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## BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

Oct 27 3 53 PM '98

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CHAIRMAN  
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COMMISSIONER

OCT 27 1998

DOCKETED BY

IN THE MATTER OF DUNCAN VALLEY  
ELECTRIC COOPERATIVE, INC.'S  
UNBUNDLED AND STANDARD OFFER  
RATES PURSUANT TO A.A.C. R14-2-1606

Docket No. E-01703A-97-0694

IN THE MATTER OF GRAHAM COUNTY  
ELECTRIC COOPERATIVE, INC.'S  
UNBUNDLED AND STANDARD OFFER  
RATES PURSUANT TO A.A.C. R14-2-1606

Docket No. E-01749A-97-0695

IN THE MATTER OF TRICO ELECTRIC  
COOPERATIVE, INC.'S UNBUNDLED AND  
STANDARD OFFER RATES PURSUANT TO  
A.A.C. R14-2-1606

Docket No. E-01461A-97-0696

IN THE MATTER OF MOHAVE ELECTRIC  
COOPERATIVE, INC.'S UNBUNDLED AND  
STANDARD OFFER RATES PURSUANT TO  
A.A.C. R14-2-1606

Docket No. E-01750A-97-0701

IN THE MATTER OF SULPHUR SPRINGS  
VALLEY ELECTRIC COOPERATIVE, INC.'S  
UNBUNDLED AND STANDARD OFFER  
RATES PURSUANT TO A.A.C. R14-2-1606

Docket No. E-01703A-97-0706

1 IN THE MATTER OF TUCSON ELECTRIC  
2 POWER COMPANY'S UNBUNDLED  
3 SERVICE TARIFFS PURSUANT TO A.A.C.  
4 R14-2-1606

Docket No. E-01933A-97-0772

5 IN THE MATTER OF ARIZONA PUBLIC  
6 SERVICE COMPANY OF UNBUNDLED AND  
7 STANDARD OFFER RATES PURSUANT TO  
8 A.A.C. R14-2-1606

Docket No. E-01345A-97-0773

9 IN THE MATTER OF THE FILING BY  
10 CITIZENS UTILITIES COMPANY OF  
11 UNBUNDLED AND STANDARD OFFER  
12 SERVICE TARIFFS PURSUANT TO A.A.C.  
13 R14-2-1602

Docket No. E-01032C-97-0774

14  
15 **APPLICATION FOR LEAVE TO INTERVENE BY**  
16 **ILLINOVA ENERGY PARTNERS**

17 Pursuant to A.A.C. R14-3-105, Illinova Energy Partners requests leave to intervene in the  
18 above-captions dockets.

19 1. Illinova Energy Partners is a subsidiary of Illinova Corporation, a corporation  
20 based in Illinois. Illinova Energy Partners is principally engaged in the production and sale of  
21 electric power and related services in deregulated and wholesale markets. Illinova Energy Partners  
22 is the holder of a FERC license to sell power anywhere in the United States and is certified as a  
23 scheduling coordinator by the California Independent System Operator. Illinova Energy Partners is  
24 a daily participant in the California wholesale and retail marketplace, providing power acquisition,  
25 scheduling coordinator and other related services for customers.

26 2. Illinova Energy Partners is preparing and will soon file an application to be  
certificated as an energy service provider in Arizona pursuant to A.A.C. R14-2-1601 *et seq.*  
Illinova Energy Partners intends to provide competitive energy services in Arizona.

1           3.     Illinova Energy Partners will be directly and substantially affected by the  
2 proceedings in these dockets because the Commission's actions will have a significant impact on  
3 Illinova Energy Partners' ability to provide competitive energy services to Arizona consumers.

4           4.     Intervention by Illinova Energy Partners will not unduly broaden the issues in  
5 these dockets. Rather, Illinova Energy Partners' participation will provide the Commission with  
6 additional information to reach informed decisions concerning effective electric competition in  
7 Arizona.

8           5.     If Illinova Energy Partners is granted intervention, all filings, orders and  
9 correspondence should be sent to:

10                               Lex J. Smith  
11                               Michael W. Patten  
12                               Brown & Bain, P.A.  
13                               2901 North Central Avenue, Suite 2000  
14                               Post Office Box 400  
15                               Phoenix, Arizona 85001-0400  
16                               **phone: (602) 351-8000**  
                             *fax: (602) 351-8516*  
                             emails: lsmith@brownbain.com  
                                      patten@brownbain.com

17           Therefore, for the foregoing reasons, Illinova Energy Partners requests that it be granted  
18 intervention in the above-captions dockets.

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24 ...  
25 ...  
26 ...

1 October 27, 1998.

2 Respectfully submitted

3 ILLINOVA ENERGY PARTNERS

4  
5 By 

6 Lex J. Smith  
7 Michael W. Patten  
8 BROWN & BAIN, P.A.  
9 Post Office Box 400  
10 Phoenix, Arizona 85001-0400  
11 (602) 351-8000

12 Attorneys for Illinova Energy Partners

13 **ORIGINAL and 10 COPIES** filed  
14 October 27, 1998, with:

15 Docket Control  
16 ARIZONA CORPORATION COMMISSION  
17 1200 West Washington Street  
18 Phoenix, Arizona 85007

19 **COPY** hand-delivered October 27, 1998, to:

20 Paul Bullis, Esq.  
21 Chief Counsel, Legal Division  
22 ARIZONA CORPORATION COMMISSION  
23 1200 West Washington Street  
24 Phoenix, Arizona 85007

25 Ray Williamson  
26 Acting Director, Utilities Division  
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Phoenix, Arizona 85007

**COPIES** mailed October 27, 1998, to:

*All parties on services list of Docket*  
*No. RE-00000C-94-0165*

